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and T. RYAN SULLIVAN*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

STEVEN TRANG, an individual,

Plaintiff/Counterdefendant,

vs.

BANK OF GEORGE, a Domestic
Corporation; and T. RYAN SULLIVAN
in his individual and professional
capacity,

Defendants/Counterclaimants.

Case No.: 2:17-cv-00162-APG-EJY

**STIPULATION AND ~~PROPOSED~~
ORDER FOR CONTINUANCE
OF DISCOVERY DEADLINES**

(First Request)

Pursuant to LR IA 6-1, 6-2, Plaintiff/Counterdefendant, in the above-captioned action, STEVEN TRANG (hereinafter, "PLAINTIFF"), by and through his attorney of record, Andre Lagomarsino, Esq. of Lagomarsino Law, and Defendants/Counterclaimants BANK OF GEORGE, a Nevada corporation (hereinafter, "BOG") and T. RYAN SULLIVAN (hereinafter "SULLIVAN") (BOG and Sullivan, together, "DEFENDANTS"), by and through their attorney of record, Richard I. Dreitzer, Esq. of the law firm of Fennemore Craig, P.C., hereby stipulate to continue the discovery deadlines approved by the Court on March 24, 2021 (ECF No. 54), by staying the outstanding discovery deadlines until Plaintiff's Special Motion to Dismiss (ECF No. 55) is ruled on by the Court or for a period of one hundred twenty (120) days, whichever is sooner, at which time the parties will jointly submit a proposed amended scheduling order with

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1 revised discovery deadlines for the Court's approval. The requested continuance is sought in
2 good faith and not for purposes of undue delay.

3 Currently, there are six (6) dates that are operative in this matter, which the Court has
4 previously approved. These are:

5 Discovery Cut-Off	October 18, 2021
6 Initial Expert Disclosure	August 18, 2021
7 Rebuttal Expert Disclosure	September 17, 2021
8 Dispositive Motions	November 17, 2021
9 Joint Pretrial Order	December 17, 2021
10 Fed. R. Civ. P. 26(a)(3) Disclosures	December 17, 2021

11 This request is submitted at least twenty-one (21) days prior to each of the six (6)
12 deadlines specified above. *See* LR 26-3 (requiring any stipulation or motion for modification or
13 extension of this discovery plan and scheduling order to be made at least twenty-one (21) days
14 prior to the expiration of the subject deadline).

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17 **DISCOVERY COMPLETED TO DATE**

18 The parties have exchanged initial disclosures pursuant to FRCP 26(a)(1). Plaintiff
19 served his Initial Disclosures on July 21, 2020. Defendants served their Initial Disclosures on
20 August 3, 2020. Plaintiff propounded and served its First Set of Interrogatories, Requests for
21 Production of Documents and Requests for Admission to Defendants on September 1, 2020.
22 Defendants propounded and served their answers to Plaintiff's First Set of Interrogatories, and
23 Requests for Admission to Plaintiff on October 7, 2020.

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1 **IT IS SO STIPULATED.**

2 DATED: this 27th day of May, 2021.

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4 **FENNEMORE CRAIG, P.C.**

5 By: /s/ Richard I. Dreitzer
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12 Attorneys for Defendants BANK OF
13 GEORGE and T. RYAN SULLIVAN

14 Dated this 27th day of May, 2021.

15 **LAGOMARSINO LAW FIRM**

16 By: /s/ Andre M. Lagomarsino
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22 aml@lagomarsinolaw.com
23 Attorneys for Plaintiff STEVEN
24 TRANG

25 **IT IS SO ORDERED.**

26
27 By: 
28 **UNITED STATES MAGISTRATE JUDGE**

Dated: May 27, 2021